

PHELPS DUNBAR LLP

28459-0002 Trademark Litigation; Trial Lawyers College

Timekeeper	Date	Hours	Rate	Amount	Narrative
Christopher K. Ralston	8/10/2024	0.50	\$360.00	\$180.00	Receipt and review of Ms. Chaloupka's correspondence, attached proposed motion and memorandum, and request for assistance in filing motion; memorandum to Ms. Calhoun re whether settlement agreement has a right to cure and/or any pre-filing prerequisites
Christopher K. Ralston	8/11/2024	0.30	\$360.00	\$108.00	Memorandum to Ms. Calhoun re draft motion to enforce forwarded by Ms. Chalupka; memorandum to Ms. Chalupka re allegations and arguments in motion and contents of settlement agreement
Christopher K. Ralston	8/12/2024	1.00	\$360.00	\$360.00	Study and review of draft motion to enforce settlement agreement; memorandum to Ms. Chaloupka re form, substance and queries re options; analysis with Ms. Calhoun re motion and terms of settlement agreement; memorandum to Ms. Chaloupka's correspondence and attachments
Lindsay Calhoun	8/12/2024	0.40	\$260.00	\$104.00	Motion to Enforce Settlement Agreement; conference with Mr. Ralston
Lindsay Calhoun	8/20/2024	0.10	\$260.00	\$26.00	Correspondence with Mr. Ralston re latest communication with Ms. Chaloupka re Motion to Enforce Settlement Agreement
Lindsay Calhoun	8/23/2024	0.20	\$260.00	\$52.00	Receipt and analysis of factual background re potential violations of settlement agreement by Defendants and potential Motion to Enforce Settlement Agreement
Christopher K. Ralston	8/24/2024	0.30	\$360.00	\$108.00	Analysis with Ms. Calhoun re motion to enforce settlement, recent posts/advertisements by Spence defendants and various related considerations from settlement agreement
Christopher K. Ralston	10/10/2024	0.20	\$360.00	\$72.00	Telephone conference with Mr. Velkei, counsel for Spence defendants, re TLC's request for return of property listed in settlement agreement

Christopher K. Ralston	10/14/2024	1.20	\$360.00	\$432.00	Memorandum to Mr. Velkei re request for return call to discuss development of issue; multiple correspondence with Ms. Chaloupka and Ms. Calhoun re settlement terms; letter to Mr. Velkei re request for return of TLC property per agreement; edit and revise draft letter per Ms. Calhoun; multiple correspondence with Mr. Velkei re return of TLC property
Lindsay Calhoun	10/14/2024	0.10	\$260.00	\$26.00	Update re Defendants' failure to abide by terms of settlement and potential Motion to Enforce Settlement Agreement and correspondence with Mr. Velkei and Mr. Ralston re the same
Lindsay Calhoun	10/17/2024	0.20	\$260.00	\$52.00	Further revision to Motion to Enforce Settlement
Lindsay Calhoun	10/21/2024	0.20	\$260.00	\$52.00	Strategy with Ms. Chaloupka and Mr. Ralston re timing of Motion to Enforce Settlement and potential response to Ms. Kushner's voluminous correspondence
Christopher K. Ralston	10/22/2024	0.50	\$360.00	\$180.00	Receipt and review of Ms. Chaloupka's correspondence and updates as to instruction and phone status; memorandum to Ms. Chaloupka re her comments and terms of settlement agreement; receipt and review of Ms. Kushner's letter and emails; memorandum to Ms. Chaloupka re Ms. Kushner's letter and contentions
Lindsay Calhoun	11/13/2024	0.20	\$260.00	\$52.00	Strategy with Mr. Ralston re Ms. Kushner's letters and filing of Motion to Enforce Settlement Agreement
Lindsay Calhoun	11/19/2024	0.60	\$260.00	\$156.00	Strategy meeting with Mr. Ralston and Mr. Ackal re potential Motion to Enforce Settlement
Lindsay Calhoun	11/20/2024	0.10	\$260.00	\$26.00	Receipt and review of multiple correspondences from Ms. Chaloupka, Ms. Kushner, and Mr. Ralston re resolution of the issue regarding TLC's plaques
Christopher K. Ralston	11/29/2024	1.00	\$360.00	\$360.00	Numerous analyses with Ms. Calhoun and Mr. Ackal re form and substance of TLC's motion to enforce settlement agreement; multiple correspondence with Ms. Chaloupka re finalized version of brief (pre-filing)

Christopher K. Ralston	11/30/2024	0.70	\$360.00	\$252.00	Receipt and review of numerous correspondence, updates and attachments from Mr. Ackal re motion to enforce settlement agreement; correspondence with Ms. Chaloupka re finalization and filing of briefs
Lindsay Calhoun	12/2/2024	2.20	\$260.00	\$572.00	Strategy with Mr. Ackal re filing of motion to enforce settlement agreement, including outreach to Clerk's Office re filing motion under seal due to confidentiality of settlement agreement; review and analyze trial transcript where confidentiality of settlement agreement is discussed; review and revise multiple drafts of motion to enforce settlement agreement and motion to file under seal, prepare and review finalized exhibits prior to filing
Mark Ackal	12/2/2024	1.90	\$230.00	\$437.00	Reviewed and analyzed local court procedural rules for filing a motion under seal.
Mark Ackal	12/2/2024	1.60	\$230.00	\$368.00	Revised Motion to Enforce Settlement Agreement to contain language concerning most recent correspondence between counsel for TLC and counsel for Defendants to enforce settlement agreement.
Rose L. Berlow	12/2/2024	0.40	\$180.00	\$72.00	Revise, finalize, docket and circulate courtesy copy of motion for leave to file under seal, proposed order and proposed motion to enforce
Rose L. Berlow	12/2/2024	2.30	\$180.00	\$414.00	Draft motion to file under seal nonpublic document regarding motion to enforce settlement, proposed order and exhibits identified as relevant to accompany same
Rose L. Berlow	12/2/2024	0.90	\$180.00	\$162.00	Revise and finalize motion to enforce settlement
Christopher K. Ralston	12/3/2024	0.20	\$360.00	\$72.00	Meeting with Mr. Ackal and Ms. Calhoun re hearing preparation
Christopher K. Ralston	12/3/2024	0.20	\$360.00	\$72.00	Receipt and review of the Court's Order re hearing on motions
Christopher K. Ralston	12/3/2024	0.20	\$360.00	\$72.00	Receipt and review of Ms. Kushner's letter

Lindsay Calhoun	12/3/2024	1.30	\$260.00	\$338.00	Voluminous correspondence from Ms. Kushner to the Court in response to TLC's motion to enforce settlement agreement; receipt and review of Defendants' formal response to motion for leave to file confidential information under seal; additional correspondence with Judge Fouratt's chambers re TLC's motion to seal confidential information, hearings for pending motions, and timing of responses; receipt and review of Court's order granting in part and denying in part motion to file under seal and respond to Judge Fouratt's instructions re the same
Mark Ackal	12/3/2024	1.70	\$230.00	\$391.00	Review and analyze Motion to Enforce Settlement Agreement and whether it complies with local district rules pertaining to conciliation requirement.
Mark Ackal	12/3/2024	0.90	\$230.00	\$207.00	Review and analyze Defendant's Response to TLC's Motion to File Under Seal.
Mark Ackal	12/3/2024	1.10	\$230.00	\$253.00	Review and analyze emails sent by B. Kushner directly to Judge's chambers wherein Kushner asserts several different arguments.
Rose L. Berlow	12/3/2024	0.70	\$180.00	\$126.00	Finalize and docket motion to enforce settlement and accompanying exhibits in accordance with court order partially granting motion to file under seal
Christopher K. Ralston	12/9/2024	1.50	\$360.00	\$540.00	Receipt and review of Ms. Kushner's letters and attachments; receipt and review of Defendants' opposition memorandum; study exhibits and attachments to Defendants' briefs; edit and revise draft reply memorandum; analysis with Ms. Berlow reposting removal; multiple correspondence with Mr. Ackal and Ms. Calhoun re options and strategy; analysis with Mr. Ackal re response to Ms. Kushner's letters and contentions
Lindsay Calhoun	12/9/2024	0.80	\$260.00	\$208.00	Review and analyze Opposition to Motion to Enforce Settlement and strategy with Mr. Ackal re response to the same
Mark Ackal	12/9/2024	1.60	\$230.00	\$368.00	Review and analyze motion in opposition to enforce settlement agreement filed by Defendants.

Christopher K. Ralston	12/10/2024	1.00	\$360.00	\$360.00	Edit and revise reply memorandum and response to Ms. Kushner; memorandum to Mr. Ackal re suggested edits and filing approach; memorandum to Ms. Chaloupka; receipt and review Ms. Chaloupka's comments and approval to file
Lindsay Calhoun	12/10/2024	0.70	\$260.00	\$182.00	Strategy re Reply in Support of Motion to Enforce Settlement Agreement, review and revise Reply, Motion for Leave to File Reply, and accompanying Proposed Order
Mark Ackal	12/10/2024	2.80	\$230.00	\$644.00	Revise reply brief to Defendants' memorandum in opposition to motion to enforce settlement agreement.
Mark Ackal	12/10/2024	3.50	\$230.00	\$805.00	Draft reply brief to Defendants' memorandum in opposition to motion to enforce settlement agreement.
Rose L. Berlow	12/10/2024	0.60	\$180.00	\$108.00	Revise, finalize, docket and circulate courtesy copy of motion for leave to file reply brief, proposed order and proposed reply brief
Lindsay Calhoun	12/11/2024	0.70	\$260.00	\$182.00	Correspondence with Judge Fouratt's chambers re motion for leave to file reply and Ms. Kushner's follow up correspondence re the same; prepare for hearing with Mr. Ackal and Mr. Ralston
Mark Ackal	12/11/2024	0.50	\$230.00	\$115.00	Review and analyze briefing to prepare for court hearing on Motion to Enforce Settlement Agreement.
Christopher K. Ralston	12/14/2024	0.10	\$360.00	\$36.00	Memorandum to Ms. Chaloupka re the Court's Order and her assistance
Christopher K. Ralston	12/14/2024	0.10	\$360.00	\$36.00	Receipt and review of Ms. Chaloupka's correspondence re the Court's Order re setting hearing
Christopher K. Ralston	12/14/2024	0.10	\$360.00	\$36.00	Memorandum to Mr. Ackal requesting documents for Ms. Chaloupka
Lindsay Calhoun	12/15/2024	0.10	\$260.00	\$26.00	Multiple correspondences with Mr. Ackal and Ms. Chaloupka re Ms. Kushner's latest correspondence and recent court orders relating to upcoming hearing
Lindsay Calhoun	12/16/2024	0.40	\$260.00	\$104.00	Receipt and review of Defendants' Response to Motion for Leave to file Reply

Lindsay Calhoun	12/17/2024	0.50	\$260.00	\$130.00	Correspondence from Ms. Kushner re January 10 hearing and review Ms. Kushner's proposed stipulated facts
Mark Ackal	12/17/2024	0.20	\$230.00	\$46.00	Review and analyzed latest correspondence from opposing counsel, B. Kushner.
Lindsay Calhoun	12/18/2024	0.80	\$260.00	\$208.00	Receipt and review of additional letter from Ms. Kushner and outline omnibus response to Ms. Kushner's multiple communications with Mr. Ackal
Mark Ackal	12/18/2024	1.50	\$230.00	\$345.00	Review and analyze set of proposed stipulated facts sent by opposing counsel, B. Kushner.
Mark Ackal	12/19/2024	0.80	\$230.00	\$184.00	Draft an email to be sent to opposing counsel in response to proposed stipulated facts.
Lindsay Calhoun	12/20/2024	0.20	\$260.00	\$52.00	Strategy with Mr. Ackal re Ms. Kushner's latest correspondence
Mark Ackal	12/20/2024	0.20	\$230.00	\$46.00	Sent email to client providing brief status update.
Lindsay Calhoun	12/23/2024	0.20	\$260.00	\$52.00	Review proposed correspondence to Ms. Kushner and comments to Mr. Ackal re the same
Christopher K. Ralston	12/30/2024	0.50	\$360.00	\$180.00	Receipt and review of Ms. Kushner's letter re proposed stipulations and the court's hearing on motions; meeting with Ms. Calhoun and Mr. Ackal re Ms. Kushner's contentions; analysis and multiple correspondence with Mr. Ackal re status of his draft; meeting with Ms. Chaloupka re Ms. Kushner's letter; meeting with Ms. Chaloupka re hearing attendance and status
Lindsay Calhoun	1/1/2025	0.20	\$260.00	\$52.00	Multiple correspondences with Mr. Ackal and Mr. Ralston re Ms. Kushner's latest correspondences and proposed stipulation of facts; additional correspondence with Mr. Ralston re discussion of settlement agreement on the record at trial
Lindsay Calhoun	1/2/2025	0.40	\$260.00	\$104.00	Strategy re response to Ms. Kushner's multiple letters in advance of January 10 hearing
Mark Ackal	1/2/2025	2.30	\$230.00	\$529.00	Review and analyze set of proposed stipulated facts sent by B. Kushner

Mark Ackal	1/2/2025	2.00	\$230.00	\$460.00	Review and analyze recent briefing to determine B. Kushner's mischaracterization in set of proposed stipulated facts.
Lindsay Calhoun	1/3/2025	0.70	\$260.00	\$182.00	Review, analyze, and propose revision to redline of Ms. Kushner's proposed statement of facts and omnibus letter response to Ms. Kushner
Mark Ackal	1/3/2025	2.60	\$230.00	\$598.00	Redline edits to B. Kushner's set of proposed facts to remove any mischaracterizations or untruthful "facts" which were included.
Mark Ackal	1/3/2025	1.70	\$230.00	\$391.00	Revise set of proposed facts provided by B. Kushner to reflect actual facts of case.
Mark Ackal	1/3/2025	2.00	\$230.00	\$460.00	Draft new set of unbiased stipulated facts and summary of issues before the court to comply with Judge Fouratt's order requiring parties to jointly file a document stating how the issues have been narrowed.
Mark Ackal	1/3/2025	1.70	\$230.00	\$391.00	Revise document containing new set of unbiased proposed stipulated facts to be sent to B. Kushner to comply with the Court's order for the parties to jointly file a document stating how the issues have been narrowed.
Lindsay Calhoun	1/5/2025	0.30	\$260.00	\$78.00	Review and proposed revision to Mr. Ackal's draft letters to Ms. Kushner and additional strategy with Mr. Ackal re the same
Mark Ackal	1/5/2025	0.50	\$230.00	\$115.00	Drafted cover email to be sent to B. Kushner offering to take down social media posts in exchange for the return of plaques.
Lindsay Calhoun	1/6/2025	0.80	\$260.00	\$208.00	Hearing preparation re arguments related to social media posts and proposals to Ms. Kushner; review and revise last draft correspondence to Ms. Kushner; multiple correspondences with Ms. Kushner re the same; strategy with Mr. Ralston and Mr. Ackal re witness testimony at January 10 hearing

Rose L. Berlow	1/6/2025	0.20	\$180.00	\$36.00	Review and analysis of notice filed by defendants regarding court order to confer and deadline to file joint statement ahead of upcoming hearing
Christopher K. Ralston	1/7/2025	2.50	\$360.00	\$900.00	Receipt and review of Ms. Chaloupka's correspondence, comments, and questions regarding postings and request for assistance with removal of certain postings from social media sites; meeting with Mr. Ackal and Ms. Berlow regarding status, progress and process of posting removal, postings at issue and postings remaining on site or social media sites; reviewed preliminary injunction and prior litigation documents for historical reference language included in settlement agreement and early references and correspondence re same; discussed arguments and correspondence with counsel concerning request for return of TLC's property and responses from defendants over course of dispute (before and after settlement agreement); discussed plan for hearing with Mr. Ackal and reviewed key documents and connection with same
Lindsay Calhoun	1/7/2025	1.90	\$260.00	\$494.00	Receipt and review of correspondence and counter-proposals from Ms. Kushner and strategy with Mr. Ackal re the same; multiple drafts of proposed joint document and notice of witnesses; extensive strategy with Mr. Ackal re the same
Rose L. Berlow	1/7/2025	0.60	\$180.00	\$108.00	Revise and prepare exhibits to joint statement regarding compliance with court order to confer ahead of upcoming hearing
Christopher K. Ralston	1/8/2025	1.80	\$360.00	\$648.00	Studied TLC's motion to enforce settlement and correspondence predating motion and in follow up to it, related exhibits and prior request for return of property; studied settlement agreement and related references to property in litigation documents and; analysis with Mr. Ackal and Ms. Calhoun regarding defendants' various arguments concerning why Property did not need to be returned and doesn't need to be returned to TLC

Mark Ackal	1/8/2025	1.10	\$230.00	\$253.00	Drafted a summary of arguments and evidence relating to motion to enforce settlement agreement.
Mark Ackal	1/8/2025	2.50	\$230.00	\$575.00	Reviewed all briefing and exhibits related to motion to enforce settlement agreement.
Christopher K. Ralston	1/9/2025	2.40	\$360.00	\$864.00	Telephone conference with Mr. Sloan regarding his testimony concerning conversations with Mr. Zelbst regarding attempts to recover TLC's property and request for the return of that property and connection with settlement agreement; telephone conference with Ms. Chaloupka regarding her testimony, if needed, ad hearing on motion to enforce settlement agreement and, if needed, efforts to remove postings from social media sites in order to avoid contention with defendants; analysis of arguments made by defendants with Mr. Ackal; receipt and review of multiple correspondence from Ms. Chaloupka regarding historical events and request by TLC for the return of and symbolic value of plaque to certain TLC Jewish alumni; memo to Ms. Chaloupka and Mr. Sloan regarding legal arguments and exhibits potentially play for hearing; receipt and review of Ms. Kushner's most recent correspondence and recent objections to posting on TLC's social media; study examples of postings objected to by defendants in advance of hearing; Reviewed outline of arguments made in respective memoranda, and reply, brief and supporting exhibits.
Lindsay Calhoun	1/9/2025	0.90	\$260.00	\$234.00	Multiple correspondences with Ms. Kushner, Judge Fouratt's chambers, and Mr. Ackal re Ms. Kushner's communication to the Court re documents at Friday's hearing; receipt and review of the Court's order denying motion for leave to file reply

Christopher K. Ralston	1/10/2025	8.00	\$360.00	\$2,880.00	Study hearing outline and selected exhibits for potential use at hearing; meeting with Mr. Ackal and Ms. Berlow regarding preparation for hearing and presentation of exhibits; attend hearing on TLC's motion to enforce settlement agreement and defendants' motion for contempt; telephone conference with Ms. Chaloupka post hearing and Mr. Ackal and Ms. Berlow regarding post-hearing tasks and options
Mark Ackal	1/10/2025	7.00	\$230.00	\$1,610.00	Attended hearing for Motion for Contempt / Motion to Enforce Settlement Agreement.
Rose L. Berlow	1/10/2025	5.60	\$180.00	\$1,008.00	Attend and assist at hearing with Judge on multiple motions
TOTAL		92.50		\$24,325.00	